

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JEFFREY RUSSELL,

Plaintiff,

v.

HEATHER PAGE,

Defendant.

CIVIL ACTION NO. \_\_\_\_\_

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Heather Page (hereinafter “Defendant”), by and through her undersigned counsel, hereby removes this action from the State Court of Cobb County, Georgia, to the United States District Court for the Northern District of Georgia, Atlanta Division.

Removal is based on diversity jurisdiction because there is complete diversity of citizenship between Plaintiffs and Defendants served in this matter, and the amount in controversy is in excess of \$75,000.00. In support of its Notice of Removal (“Notice”), Defendant states the following:

**I. Background**

1. This case was originally filed by Plaintiff Jeffrey Russell in the State Court of Cobb County, Georgia on April 30, 2023. In Plaintiff’s Complaint for

Damages (the “Complaint”), Plaintiff Jeffrey Russell alleges he sustained injuries to his self and damage to his vehicle after being involved in a motor vehicle accident on or about November 19, 2021.

2. In accordance with 28 U.S.C. 1446(a), a copy of all process, pleadings, and orders served upon Defendant are attached hereto as **Exhibit A.** A copy of the Notice of Filing Notice of Removal, filed in the State Court of Cobb County, Georgia is attached hereto as **Exhibit B.**

## **II. THIS NOTICE OF REMOVAL IS TIMELY FILED**

3. This lawsuit is a case within the meaning of the Acts of Congress relating to the removal of civil actions.

4. Defendant received a copy of Plaintiff’s Complaint by individual service on May 15, 2023. The Affidavit of Service of Process is attached hereto as **Exhibit C.**

5. The removal of this action to this Court is timely under 28 U.S.C. § 1446(b) because this Notice of Removal is filed within thirty (30) days after May 15, 2023, which is the date Defendant first received the Summons and Complaint in this action. **(Exhibit C).**

6. The United States District Court for the Northern District of Georgia, Atlanta Division, is the proper place to file this Notice of Removal under 28 U.S.C. § 1441(a) because it is the federal district court that embraces the place

where the original action was filed and is pending.

### **III. THIS COURT HAS DIVERSITY JURISDICTION**

7. Upon information and belief and according to the pleadings in this matter, Plaintiff Jeffery Russell is a resident, domiciliary and citizen of Cobb County in the State of Georgia, who resides at 2164 Asquith Avenue SW Marietta, Georgia 30008. Mr. Russell has filed his case in Cobb County State Court and has therefore submitted to the jurisdiction. Plaintiff alleges he sustained property damage to his vehicle and bodily injury from a motor vehicle accident involved with Defendant on or around November 19, 2021. This Court has personal jurisdiction over Plaintiff Jeffery Russell.

8. Defendant Heather Page is a resident, domiciliary and citizen of Collierville, Tennessee who resides at 240 Brier Hills Drive, Collierville, Tennessee 38017. **Exhibit C.**

9. Upon information and belief, there is complete diversity of citizenship between “the parties in interest properly joined and served as defendants.”

10. According to the Complaint, Plaintiff has special damages in the amount of \$50,200.07. He also claims significant physical and mental pain and suffering and costs and expenses of the litigation. In addition, Plaintiff has presented a surgical estimate from Barbour Orthopedics and Sports Medicine totaling an additional \$73,468.90, which brings the Plaintiff’s claims well above

the \$75,000.00 requirement for removal. Due to the medical nature of the billings, Defendant has not attached the document as an exhibit, but can provide a sealed copy upon request by the Court and permission by Plaintiff.

#### **IV. NOTICE OF REMOVAL TO THE STATE COURT OF COBB COUNTY**

11. Concurrently with this Notice of Removal, Defendant Heather Page will file a copy of this Notice with the State Court of Cobb County, Georgia. A copy of the written notice of the Notice of Removal to Federal Court is attached hereto as **Exhibit B.** In accordance with 28 U.S.C. § 1446(d), Defendant Heather Page will give written notice to Plaintiff by contemporaneously serving him with this Notice.

12. If any questions arises as to the propriety of the removal of this action, Defendant respectfully requests the opportunity to present a brief and oral argument in support of its position that this case is removable. See *Sierminski v. Transouth Fin. Corp.*, 216 F.3d 945, 949 (11th Cir. 2000) (post-removal evidence in assessing removal jurisdiction may be considered by the Court).

#### **IV. CONCLUSION**

For the foregoing reasons, Defendant Heather Page, respectfully requests that this civil action be, and is hereby, removed to the United States District Court for the Northern District of Georgia, Atlanta Division, that this Court assume jurisdiction of this civil action, and that this Court enter such other that further

orders as may be necessary to accomplish the requested removal.

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE,  
LLC

/s/ Mary-Margaret Noland

MARY-MARGARET NOLAND (GA Bar  
No. 688181)

mary-margaret.noland@mgclaw.com

MARK J. EDWARDS (GA Bar No.  
698903)

Mark.edwards@mgclaw.com

Post Office Box 57365

270 Peachtree Street, NW, Suite 1800  
(30303)

Atlanta, Georgia 30343

(678) 500-7314

*Attorneys for Heather Page*

**CERTIFICATION**

Pursuant to L.R. 7.1(D) N.D.Ga., I certify that this document has been prepared in Times New Roman Font 14 point, as approved by the Court in L.R. 5.1B, N.D.Ga.

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE,  
LLC

/s/ Mary-Margaret Noland

MARY-MARGARET NOLAND (GA Bar  
No. 688181)

mary-margaret.noland@mgclaw.com

MARK J. EDWARDS (GA Bar No.  
698903)

Mark.edwards@mgclaw.com

Post Office Box 57365

270 Peachtree Street, NW, Suite 1800  
(30303)

Atlanta, Georgia 30343

(678) 500-7314

*Attorneys for Heather Page*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Notice of Removal* was served upon all counsel of record via the Court's electronic filing system which automatically sends a service copy via electronic mail notification to all counsel of record addressed as follows:

Email: smoskowitz@attorneykennugent.com  
Sarah E. Moskowitz  
Kenneth S. Nugent, P.C.  
4227 Pleasant Hill Road, Building 11  
Duluth, Georgia 30096  
Attorney for Jeffrey Russell

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE,  
LLC

/s/ Mary-Margaret Noland  
MARY-MARGARET NOLAND (GA Bar  
No. 688181)  
mary-margaret.noland@mgclaw.com  
MARK J. EDWARDS (GA Bar No.  
698903)  
Mark.edwards@mgclaw.com  
Post Office Box 57365  
270 Peachtree Street, NW, Suite 1800  
(30303)  
Atlanta, Georgia 30343  
(678) 500-7314  
*Attorneys for Heather Page*

# **EXHIBIT A**



ID# E-FVGSDDW4-MLV  
FILED IN OFFICE  
CLERK OF STATE COURT  
COBB COUNTY, GEORGIA  
**23-A-1819**

APR 30, 2023 12:21 PM

  
Robin C. Bishop, Clerk of State Court  
Cobb County, Georgia

IN THE STATE COURT OF COBB COUNTY  
STATE OF GEORGIA

JEFFREY RUSSELL,

Plaintiff,

v.

HEATHER PAGE,

Defendant.

CIVIL ACTION FILE NO.

**COMPLAINT FOR DAMAGES**

COMES NOW Jeffrey Russell, Plaintiff in the above-styled action, by and through his undersigned counsel, Kenneth S. Nugent, P.C., and hereby file this, his *Complaint for Damages* (hereinafter the "Complaint") against Defendant Heather Page, and show this Honorable Court as follows:

**PARTIES AND JURISDICTION**

1.

Plaintiff Jeffrey Russell (hereinafter "Plaintiff") is a resident of the State of Georgia and has been a resident of State of Georgia at all times relevant to this action.

2.

Defendant Heather Page (hereinafter "Defendant") is a resident of the State of Tennessee and can be served with the *Summons* and *Complaint for Damages* at her residence address, to wit: 240 Brier Hills Drive, Collierville, Fayette County, Tennessee 38017.

3.

The acts of negligence giving rise to this Complaint for Damages occurred in Cobb County, Georgia.

4.

Defendant is subject to the jurisdiction and venue of this Court pursuant to O.C.G.A. §40-12-2, or Non-Resident Motorist Act.

**SUMMARY OF FACTS**

5.

On or about November 19, 2021, Plaintiff was a restrained front-seat passenger in a vehicle driven by Marlon Grayson. Marlon Grayson was traveling eastbound on the Interstate 20 near Six Flags Parkway in Cobb County, Georgia.

6.

At all times relevant hereto, the vehicle occupied by Plaintiff was operated in a safe, reasonable, and prudent fashion.

7.

On or about said time and place, Defendant was the driver of a 2020 Ford EPD. Defendant was traveling in the same direction as Plaintiff. Suddenly and without warning, Defendant rear-ended the vehicle in front of her, driven by Michael Hester. The impact was so significant that Mr. Hester's vehicle was pushed into the vehicle driven by Mr. Grayson. Defendant caused the collision, resulting in damages to all vehicles and bodily injuries to Plaintiff (See Accident Report attached as **Exhibit "A"**).

**COUNT I**  
**NEGLIGENCE AND NEGLIGENCE PER SE**

8.

Plaintiff re-incorporates and re-alleges Paragraphs 1-7 of this Complaint as fully set forth herein in their entirety.

9.

At said time and place, Defendant failed to act in the manner expected of a reasonable and prudent driver by following too closely.

10.

To that effect, Defendant was found at fault for Following Too Closely, in violation of O.C.G.A. § 40-6-49, which constitutes negligence per se, and said Defendant was otherwise negligent.

11.

The tortious acts and omissions committed by Defendant, which caused the subject collision and resulting injuries, include, but are not limited to, the following:

- a) following too closely, in violation of O.C.G.A. § 40-6-49;
- b) failure to use due care while driving, O.C.G.A. § 40-6-241, said violation being negligence per se;
- c) operating her vehicle with reckless disregard for the safety of other persons on the roadway in violation of O.C.G.A. § 40-6-390, said violation being negligence per se;
- d) failure to control her vehicle as to avoid a collision, in violation of the requirements of ordinary care and diligence; and,
- e) such other specifications of negligence as shall be added by amendment or proven at trial.

12.

As a direct and proximate result of the collision, Plaintiff sustained immediate injuries to his cervical and lumbar spine.

13.

The aforesaid collision was not the result of any negligence on the part of Plaintiff.

14.

Defendant's negligent actions were the sole, direct, and proximate cause of the collision.

15.

As a result of the injuries Plaintiff sustained in the collision, he has incurred significant physical and mental pain and suffering, as well as special damages in the amount of \$50,200.07, which is subject to being supplemented at the time of trial and is itemized as follows:

Comprehensive Wellness Center	\$555.00
AICA Orthopedics-Lithia Springs	\$14,692.00
Summit Surgery Center of Buckhead	\$5,000.00
Barbour Orthopaedics	\$13,880.67
American Health Imaging	\$4,595.00
Acute Physical Therapy	\$5,635.00
<b>TOTAL:</b>	<b>\$50,200.07</b>

16.

Defendant is liable for the injuries sustained by Plaintiff and responsible for the special and general damages incurred by Plaintiff as a result of this collision.

17.

Plaintiff is entitled to recover from Defendant for his medical expenses, pain and suffering, and any other general or special damages incurred as a result of the collision.

**WHEREFORE**, Plaintiff prays that he has judgment against Defendant as follows:

- (a) that summons issues and service be perfected upon Defendant requiring her to appear before this Court and answer this *Complaint for Damages*;
- (b) for general damages to be determined by the enlightened conscience of an impartial jury;
- (c) for special damages in the amount of **\$50, 200.07**, to be proven by evidence at trial;
- (d) for costs and expenses of this litigation;
- (e) for any and all other and further relief that this Court deems just and proper under the circumstances; and
- (f) for a trial by jury on all issues so triable.

Respectfully submitted this 30<sup>th</sup> day of April, 2023.

**KENNETH S. NUGENT, P.C.**

By: /s/ Sarah E. Moskowitz  
SARAH E. MOSKOWITZ  
Georgia State Bar No.: 873693  
JAN P. COHEN  
Georgia State Bar No.: 174337  
***Attorneys for Plaintiff***

4227 Pleasant Hill Road  
Building 11  
Duluth, Georgia 30096  
T: (404) 875-0900  
F: (678) 957-8657  
[smoskowitz@attorneykennugent.com](mailto:smoskowitz@attorneykennugent.com)  
[jcohen@attorneykennugent.com](mailto:jcohen@attorneykennugent.com)

Agency Case Number 21090510		Agency NCIC No. 0330200		GEORGIA MOTOR VEHICLE CRASH REPORT		County COB		Date Rec. by DOT 11/19/2021	
Estimated Crash Date 11/19/2021		Dispatch Date 11/19/2021		Arrival Date 11/19/2021		Total Number of Vehicles 3		Injuries 0	
Time 11:30		Time 11:31		Time 11:45		Fatalities 0		Inside City Of	
Road of Occurrence I 20 East				From Its Intersection With				<input type="checkbox"/> Suppl. To Original? <input type="checkbox"/> Private Property? <input type="checkbox"/> Hit And Run?	
Not At Its Intersection But 500				Of SIX FLAGS PKWY					
Latitude (Y) 33.77099 (Format) 00.00000				Longitude (X) -84.54379 (Format) -00.00000					
Unit # 1 <input checked="" type="checkbox"/> Driver <input type="checkbox"/> Ped <input type="checkbox"/> Bike <input checked="" type="checkbox"/> Susp At Fault		LAST NAME PAGE FIRST HEATHER MIDDLE B Address 240 BRIER HILLS DR		Unit # 2 <input type="checkbox"/> Driver <input type="checkbox"/> Ped <input type="checkbox"/> Bike <input type="checkbox"/> Susp At Fault		LAST NAME HESTER FIRST MICHAEL MIDDLE DAVID Address 25 PLYMOUTH LN			
City COLLIERVILLE		State TN		Zip 38017		DOB			
Driver's License No 084588005		Class CLASS D		State TN		Country			
Insurance Co. BUILDERS PREMIER INS		Policy No. PCA0028952		Telephone No. 8012103939		Insurance Co. STATE FARM FIRE AND CASUALTY C		Policy No. 1128187193001	
Year 2020		Make FORD		Model EPD		Year 2015		Make NISSAN	
VIN 1FMAJ1J76LEA08061		Vehicle Color Silver				VIN 3N1CE2CP2FL365751		Vehicle Color Unknown	
Tag # 383H196		State TN		County		Year 2022			
Trailer Tag #		State		County		Year			
<input checked="" type="checkbox"/> Same as Driver		Owner's Last Name PAGE		First HEATHER		Middle B			
Address 240 BRIER HILLS DR		City COLLIERVILLE		State TN		Zip 38017			
Removed By: DRIVER		<input type="checkbox"/> Request		<input type="checkbox"/> List		Removed By: DRIVER		<input type="checkbox"/> Request	
Alcohol Test: No		Type: Not Tested		Results: None Given		Drug Test: No		Type: Results:	
First Harmful Event: Motor Vehicle In Motion		Most Harmful Event: Motor Vehicle In Motion		Operator/Ped Cond: Not Drinking		First Harmful Event: Motor Vehicle In Motion		Most Harmful Event: Motor Vehicle In Motion	
Operator Factors: Following too Close		Vehicle Factors: No Contributing Factors		Roadway Factors: No Contributing Factors		Operator Factors: No Contributing Factors		Vehicle Factors: No Contributing Factors	
Direction of Travel: East		Vehicle Maneuver: Straight		Non-Motor Maneuver:		Direction of Travel: East		Vehicle Maneuver: Stopped	
Vehicle Class: Privately Owned		Vehicle Type: Sports Utility Vehicle (SUV)		Vision Obscured: Sunlight/Glare		Vehicle Class: Privately Owned		Vehicle Type: Passenger Car	
Number of Occupants: 5		Area of Initial Contact: Front End		Damage to Vehicle: Functional Damage		Number of Occupants: 1		Area of Initial Contact: Rear End	
Traffic Way Flow: Two-Way Trafficway with a physical separation		Road Composition: Black Top		Road Character: Straight and Level		Traffic Way Flow: Two-Way Trafficway with a physical separation		Road Composition: Black Top	
Number of Lanes: 6		Posted Speed: 60		Work Zone: None		Number of Lanes: 6		Posted Speed: 60	
Traffic Control: Lanes		Device Inoperative: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				Traffic Control: Lanes		Device Inoperative: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Citation Information:		Citation # 3895332		O.C.G.A. § 40-6-49		Citation Information:		Citation #	
		Citation #		O.C.G.A. §				Citation #	
		Citation #		O.C.G.A. §				Citation #	
COMMERCIAL MOTOR VEHICLES ONLY									
Carrier Name		City		State		Zip			
U.S. D.O.T. #		No. of Axes		G.V.W.R		U.S. D.O.T. #		No. of Axes	
Cargo Body Type		Vehicle Config.		<input type="checkbox"/> Interstate <input type="checkbox"/> Intrastate		Fed. Reportable <input type="checkbox"/> Yes <input type="checkbox"/> No			
C.D.L. ? <input type="checkbox"/> Yes <input type="checkbox"/> No		C.D.L. Suspended? <input type="checkbox"/> Yes <input type="checkbox"/> No				C.D.L. ? <input type="checkbox"/> Yes <input type="checkbox"/> No		C.D.L. Suspended? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Vehicle Placarded? <input type="checkbox"/> Yes <input type="checkbox"/> No		Hazardous Materials? <input type="checkbox"/> Yes <input type="checkbox"/> No				Vehicle Placarded? <input type="checkbox"/> Yes <input type="checkbox"/> No		Hazardous Materials? <input type="checkbox"/> Yes <input type="checkbox"/> No	
Hazmat Released? <input type="checkbox"/> Yes <input type="checkbox"/> No						Hazmat Released? <input type="checkbox"/> Yes <input type="checkbox"/> No			
If YES: Name or 4 Digit Number from Diamond or Box:		One Digit Number from Bottom of Diamond:				If YES: Name or 4 Digit Number from Diamond or Box:		One Digit Number from Bottom of Diamond:	
<input type="checkbox"/> Ran Off Road		<input type="checkbox"/> Down Hill Runaway		<input type="checkbox"/> Cargo Loss or Shift		<input type="checkbox"/> Separation of Units		<input type="checkbox"/> Ran Off Road	

Unit # <b>3</b>	<input checked="" type="checkbox"/> Driver	LAST NAME GRAYSON		FIRST MARLON	MIDDLE LAMART
	<input type="checkbox"/> Ped <input type="checkbox"/> Bike	Address 2105 MESA VALLEY WAY APT 701			
<input type="checkbox"/> Susp At Fault					
City AUSTELL		State GA	Zip 30106817	DOB [REDACTED]	
Driver's License No 057787177		Class CLASS CM	State GA	Country	
Insurance Co. AMERICAN STANDARD INSURANCE		Policy No. 410721265882		Telephone No. 4045061794	
Year 2013		Make FORD	Model F150		
VIN 1FTFW1CF8DFA56929		Vehicle Color Unknown			
Tag # VEV988	State GA	County		Year 2022	
Trailer Tag #	State	County		Year	
<input type="checkbox"/> Same as Driver					
Owner's Last Name GRAYSON		First MARLON		Middle	
Address 2105 MESA VALLEY WAY APT 701					
City AUSTELL		State GA	Zip 301068172		
Removed By: DRIVER			<input type="checkbox"/> Request	<input type="checkbox"/> List	
Alcohol Test: No	Type: Not Tested	Results: None Given	Drug Test: No	Type:	Results:
First Harmful Event: Motor Vehicle In Motion		Most Harmful Event: Motor Vehicle In Motion		Operator/Ped Cond: Not Drinking	
Operator Factors: No Contributing Factors					
Vehicle Factors: No Contributing Factors		Roadway Factors: No Contributing Factors			
Direction of Travel: East		Vehicle Maneuver: Stopped		Non-Motor Maneuver:	
Vehicle Class: Privately Owned		Vehicle Type: Pickup Truck		Vision Obscured: Sunlight/Glare	
Number of Occupants: 2		Area of Initial Contact: Rear End		Damage to Vehicle: Minor Damage	
Traffic Way Flow: Two-Way Trafficway with a physical separation		Road Composition: Black Top		Road Character: Straight and Level	
Number of Lanes: 6		Posted Speed: 60		Work Zone: None	
Traffic Control: Lanes		Device Inoperative: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Citation Information:					
Citation #		O.C.G.A. §			
Citation #		O.C.G.A. §			
Citation #		O.C.G.A. §			
COMMERCIAL MOTOR VEHICLES ONLY					
Carrier Name					
Address		City		State	Zip
U.S. D.O.T. #		No. of Axes		G.V.W.R	
Cargo Body Type	Vehicle Config.	<input type="checkbox"/> Interstate <input type="checkbox"/> Intrastate	Fed. Reportable <input type="checkbox"/> Yes <input type="checkbox"/> No		
C.D.L. ?	<input type="checkbox"/> Yes <input type="checkbox"/> No	C.D.L. Suspended?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Vehicle Placarded?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Hazardous Materials?		<input type="checkbox"/> Yes <input type="checkbox"/> No	
Hazmat Released? <input type="checkbox"/> Yes <input type="checkbox"/> No					
If YES: Name or 4 Digit Number from Diamond or Box: One Digit Number from Bottom of Diamond:					
<input type="checkbox"/> Ran Off Road <input type="checkbox"/> Down Hill Runaway <input type="checkbox"/> Cargo Loss or Shift <input type="checkbox"/> Separation of Units					

## COLLISION FIELDS

Manner of Collision: Rear End

Location at Area of Impact: On Roadway - Non-Intersection

Weather: Clear

Surface Condition: Dry

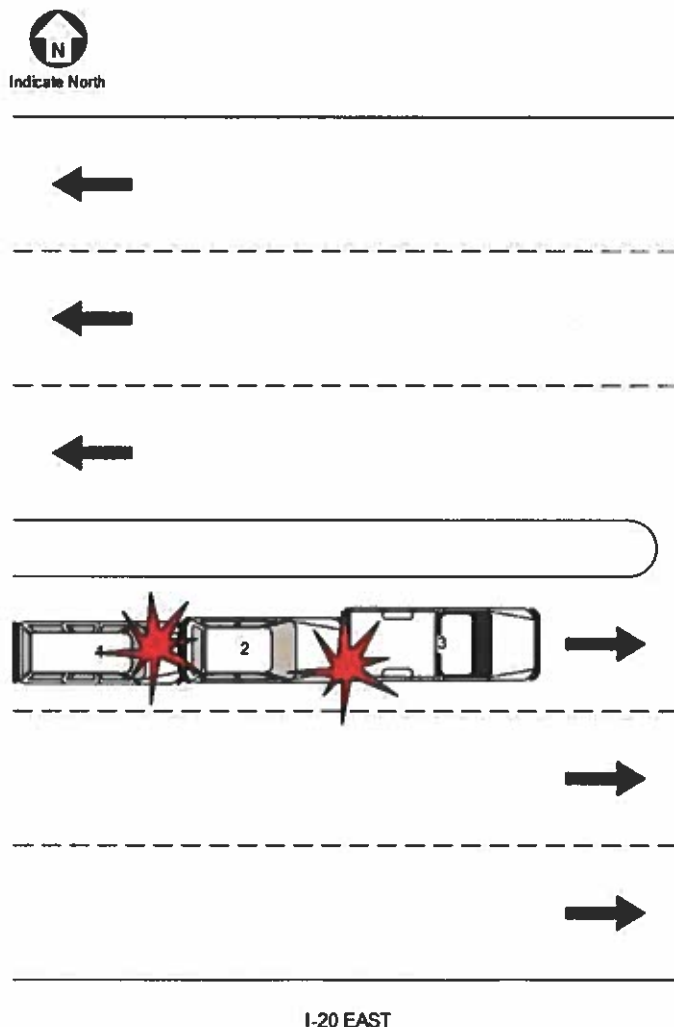
Light Condition: Daylight

## NARRATIVE

Added :Nov 19 2021 1:36PM

While traveling east bound on I-20 Vehicle 1 hit the rear of Vehicle 2 pushing it into Vehicle 3 which stopped for traffic. Driver 1 stated the sun was in her eyes and she could not see very well. She said the traffic stopped in front of her and she could not stop in time and hit Vehicle 2 which pushed it into vehicle 3. Driver 2 stated he was hit by Vehicle 1 and pushed into Vehicle 3. Driver 3 stated he was stopped and was hit by Vehicle 2. No injuries reported at the scene and Driver 1 was cited. All vehicles were drivable.

## DIAGRAM



Drawing Not To Scale.

## PROPERTY DAMAGE INFORMATION

Damage Other Than Vehicle:

Owner:

## WITNESS INFORMATION

Name (Last, First)

Address

City

State

Zip Code

Telephone Number



## OCCUPANT INFORMATION

1	Name (Last, First): PAGE, HEATHER					Address: 240 BRIER HILLS DR COLLIERVILLE, TN 38017				
	Age: 41	Sex: Female	Unit # 1	Position: Front Seat-Left Side	Safety Eq: Lap and Shoulder Belt Used	Ejected: Not Ejected	Extricated: No	Air Bag: Non-Deployed Air	Injury: No Apparent Injury (C)	Taken for Treatment: No
	Injured Taken To:		By:		EMS Notified Time:		EMS Arrival Time:		Hospital Arrival Time:	
2	Name (Last, First): PAGE, EMMA					Address: 240 BRIER HILLS COLLIERVILLE, TN 38017				
	Age: 17	Sex: Female	Unit # 1	Position: Front Seat-Right Side	Safety Eq: Lap and Shoulder Belt Used	Ejected: Not Ejected	Extricated: No	Air Bag: Non-Deployed Air	Injury: No Apparent Injury (C)	Taken for Treatment: No
	Injured Taken To:		By:		EMS Notified Time:		EMS Arrival Time:		Hospital Arrival Time:	
3	Name (Last, First): BURGESS, HUNTER					Address: 240 BRIER HILLS DR COLLIERVILLE, TN 38017				
	Age: 16	Sex: Male	Unit # 1	Position: Rear Seat-Right Side	Safety Eq: Lap and Shoulder Belt Used	Ejected: Not Ejected	Extricated: No	Air Bag: No Air Bag in This	Injury: No Apparent Injury (C)	Taken for Treatment: No
	Injured Taken To:		By:		EMS Notified Time:		EMS Arrival Time:		Hospital Arrival Time:	
4	Name (Last, First): LAURENDEA, HAYLEY					Address: 240 BRIER HILLS DR COLLIERVILLE, TN 38017				
	Age: 17	Sex: Female	Unit # 1	Position: Rear Seat-Left Side	Safety Eq: Lap and Shoulder Belt Used	Ejected: Not Ejected	Extricated: No	Air Bag: No Air Bag in This	Injury: No Apparent Injury (C)	Taken for Treatment: No
	Injured Taken To:		By:		EMS Notified Time:		EMS Arrival Time:		Hospital Arrival Time:	
5	Name (Last, First): PAGE, DYLAN					Address: 240 BRIER HILLS DR COLLIERVILLE, TN 38017				
	Age: 16	Sex: Male	Unit # 1	Position: Sleeper Section of Cab	Safety Eq: Lap and Shoulder Belt Used	Ejected: Not Ejected	Extricated: No	Air Bag: No Air Bag in This	Injury: No Apparent Injury (C)	Taken for Treatment: No
	Injured Taken To:		By:		EMS Notified Time:		EMS Arrival Time:		Hospital Arrival Time:	
6	Name (Last, First): HESTER, MICHAEL					Address: 25 PLYMOUTH LN CARROLLTON, GA 30178855				
	Age: 60	Sex: Male	Unit # 2	Position: Front Seat-Left Side	Safety Eq: Lap and Shoulder Belt Used	Ejected: Not Ejected	Extricated: No	Air Bag: Non-Deployed Air	Injury: No Apparent Injury (C)	Taken for Treatment: No
	Injured Taken To:		By:		EMS Notified Time:		EMS Arrival Time:		Hospital Arrival Time:	
7	Name (Last, First): GRAYSON, MARLON					Address: 2105 MESA VALLEY WAY APT 701 AUSTELL, GA 301068172				
	Age: 46	Sex: Male	Unit # 3	Position: Front Seat-Left Side	Safety Eq: Lap and Shoulder Belt Used	Ejected: Not Ejected	Extricated: No	Air Bag: Non-Deployed Air	Injury: No Apparent Injury (C)	Taken for Treatment: No
	Injured Taken To:		By:		EMS Notified Time:		EMS Arrival Time:		Hospital Arrival Time:	
8	Name (Last, First): RUSSELL, JEFFREY					Address: 2164 ASQUITH AVE SW MARIETTA, GA 30006				
	Age: 59	Sex: Male	Unit # 3	Position: Front Seat-Right Side	Safety Eq: Lap and Shoulder Belt Used	Ejected: Not Ejected	Extricated: No	Air Bag: Non-Deployed Air	Injury: No Apparent Injury (C)	Taken for Treatment: No
	Injured Taken To:		By:		EMS Notified Time:		EMS Arrival Time:		Hospital Arrival Time:	
ADMINISTRATIVE										
Photos Taken: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					By:		Officer Note: If collision resulted in a fatality, please send prompt notification to the GDOT Crash Reporting Unit via either email at GeorgiaFARS@dot.ga.gov or Fax at (404) 635-2963.			
Report By: WILLIAMS, (1689)		Agency: Cobb County Police Department		Report Date: 11/19/2021 00:00		Checked By: BRANTLEY,		Date Checked: 11/19/2021		

ID# E-FVGSDDW4-WQZ

FILED IN OFFICE

CLERK OF STATE COURT

COBB COUNTY, GEORGIA

**23-A-1819**

APR 30, 2023 12:21 PM

*Robin C. Bishop*

Robin C. Bishop, Clerk of State Court  
Cobb County, Georgia

**STATE COURT OF COBB COUNTY  
STATE OF GEORGIA**

CIVIL ACTION NUMBER 23-A-1819

\$198.00 COST PAID

Russell, Jeffrey

**PLAINTIFF**

**VS.**

Page, Heather

**DEFENDANT**

**SUMMONS**

TO: PAGE, HEATHER

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

**Sarah E Moskowitz  
Kenneth S. Nugent, P.C.  
4227 Pleasant Hill Road  
Bldg. 11  
Duluth, Georgia 30096**

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

**This 1st day of May, 2023.**

Clerk of State Court



*Robin C. Bishop*

Robin C. Bishop, Clerk of State Court  
Cobb County, Georgia

IN THE STATE COURT OF COBB COUNTY  
STATE OF GEORGIA

JEFFREY RUSSELL,

Plaintiff,

v.

Civil Action No. 23-A-1819

HEATHER PAGE,

Defendant.

**ANSWER AND AFFIRMATIVE DEFENSES OF  
DEFENDANT HEATHER PAGE TO PLAINTIFF'S COMPLAINT**

COMES NOW HEATHER PAGE (hereinafter "Defendant" or "Page"), Defendant in the above-styled action, and hereby responds to Plaintiff's Complaint (Plaintiff's "Complaint"), showing this Court as follows:

**FIRST DEFENSE**

Plaintiff's Complaint fails to state a claim against Defendant upon which relief may be granted.

**SECOND DEFENSE**

It is denied that all of Plaintiff's injuries and damages were proximately caused by the subject alleged incident.

**THIRD DEFENSE**

If it is judicially determined that Defendant is liable for any injuries sustained by Plaintiff, which is denied, then Defendant states that any injuries so sustained were caused, in whole or in part, by the Plaintiff's own negligence and/or fault, and/or assumption of the risk, and that Plaintiff's damages therefore should be reduced by the percentage commensurate with the degree of negligence or fault attributable to Plaintiff or barred completely.

**FOURTH DEFENSE**

The sole, direct and proximate cause of any injury or damage which Plaintiff may have sustained was due to acts or omissions of some other person, persons or entity other than Defendant and therefore Plaintiff is not entitled to recover anything from Defendant.

**FIFTH DEFENSE**

No act or omission on the part of Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff, and therefore Plaintiff is not entitled to recover anything from Defendant.

**SIXTH DEFENSE**

Defendant specially appears in this matter for purposes of the Answer; Defendant asserts and does not waive its affirmative defenses for lack of service and insufficiency of service.

**SEVENTH DEFENSE**

Defendant states that she reserves and does not waive all applicable defenses as set forth in O.C.G.A. 9-11-12(b).

**EIGHTH DEFENSE**

Pursuant to O.C.G.A. § 51-12-33(a) and (b), any damages recoverable by Plaintiff must be apportioned among each person or entity that caused or contributed to the alleged damages based on the percentages of fault assigned by the trier of fact.

**NINTH DEFENSE**

Defendant reserves the right to assert further Affirmative Defenses that become apparent through discovery.

Subject to the foregoing defenses, Defendant hereby responds to the Plaintiff's Complaint

as follows:

1.

Defendant is presently without sufficient information or knowledge to either admit or deny the allegations contained in Paragraph 1 of Plaintiff's Complaint. Therefore, the allegations contained therein are denied at this time, and strict proof demanded.

2.

Defendant admits the allegations contained in Paragraph 2 of Plaintiff's Complaint.

3.

Defendant denies the allegations contained in Paragraph 3 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

4.

At this time, the Defendant reserves any defenses to jurisdiction and venue, pending investigation and discovery.

### **SUMMARY OF FACTS**

5.

Defendant is presently without sufficient information or knowledge to either admit or deny the allegations contained in Paragraph 5 of Plaintiff's Complaint. Therefore, the allegations contained therein are denied at this time, and strict proof demanded.

6.

Defendant denies the allegations contained in Paragraph 6 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

7.

Defendant admits only that she was the driver of a 2020 Ford EPD travelling in the same direction as the Plaintiff. Defendant admits that she came into contact with the vehicle driven by Michael Hester. Defendant denies the remaining allegations contained in Paragraph 7 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

**COUNT I**  
**NEGLIGENCE AND NEGLIGENCE PER SE**

8.

Defendant repeats and reiterates the responses contained in the above Paragraphs as if fully set forth herein.

9.

Defendant denies the allegations contained in Paragraph 9 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

10.

Defendant objects to the extent that Paragraph 10 calls for legal conclusions. As such, Defendant is not required to admit or deny the same. To the extent that Paragraph 10 may be interpreted to contain allegations against this Defendant, Defendant denies the same and demands strict proof thereof.

11.

Defendant denies the allegations contained in Paragraph 11 of Plaintiff's Complaint as

stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

12.

Defendant denies the allegations contained in Paragraph 12 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

13.

Defendant denies the allegations contained in Paragraph 13 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

14.

Defendant denies the allegations contained in Paragraph 14 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

15.

Defendant denies the allegations contained in Paragraph 15 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

16.

Defendant denies the allegations contained in Paragraph 16 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

17.

Defendant denies the allegations contained in Paragraph 17 of Plaintiff's Complaint as stated, and demands strict proof thereof. Further, no act or omission on the part of this Defendant caused or contributed to any of the alleged injuries or damages claimed by Plaintiff.

Defendant denies the Plaintiff's Prayer for Relief and WHEREFORE Paragraphs.

**EACH AND EVERY ALLEGATION CONTAINED IN PLAINTIFF'S COMPLAINT WHICH HAS NOT BEEN SPECIFICALLY ADMITTED OR OTHERWISE RESPONDED TO BY DEFENDANT, IS HEREBY DENIED.**

**WHEREFORE**, having fully responded to Plaintiff's Complaint, Defendant prays as follows:

- (a) That it be discharged without liability to Plaintiff;
- (b) That all costs be assessed against Plaintiff;
- (c) That this Court enter such other and further relief as it deems just and proper.

**DEMAND FOR TRIAL BY JURY**

Defendant demands a trial by jury of 12 persons.

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE, LLC

*/s/ Mary-Margaret Noland*

MARY-MARGARET NOLAND (GA Bar No. 688181)

mary-margaret.noland@mgclaw.com

MARK J. EDWARDS (GA Bar No. 698903)

Mark.edwards@mgclaw.com

Post Office Box 57365

270 Peachtree Street, NW, Suite 1800 (30303)

Atlanta, Georgia 30343

(678) 500-7314

*Attorneys for Heather Page*



**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Answer and Affirmative Defenses of Defendant Heather Page to Plaintiff's Complaint* was served upon all counsel of record via the Court's electronic filing system which automatically sends a service copy via electronic mail notification to all counsel of record addressed as follows:

Email: smoskowitz@attorneykennugent.com  
Sarah E. Moskowitz  
Kenneth S. Nugent, P.C.  
4227 Pleasant Hill Road  
Building 11  
Duluth, Georgia 30096  
Attorney for Jeffrey Russell

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE, LLC

/s/ Mary-Margaret Noland

MARY-MARGARET NOLAND (GA Bar No. 688181)

mary-margaret.noland@mgclaw.com

MARK J. EDWARDS (GA Bar No. 698903)

Mark.edwards@mgclaw.com

Post Office Box 57365

270 Peachtree Street, NW, Suite 1800 (30303)

Atlanta, Georgia 30343

(678) 500-7314

*Attorneys for Heather Page*

# **EXHIBIT B**

IN THE STATE COURT OF COBB COUNTY  
STATE OF GEORGIA

JEFFREY RUSSELL,

Plaintiff,

v.

Civil Action No. 23-A-1819

HEATHER PAGE,

Defendant.

**NOTICE OF NOTICE OF REMOVAL TO FEDERAL COURT**

PLEASE TAKE NOTICE that on June 13, 2023, Defendant Heather Page filed a *Notice of Removal* of this action, pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, in the United States District Court for the Northern District of Georgia, Atlanta Division. Pursuant to 28 U.S.C. § 1446(d), "the State court shall proceed no further unless and until the case is remanded." A copy of the *Notice of Removal*, without exhibits, is attached hereto as Exhibit A.

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE, LLC

/s/ Mary-Margaret Noland

MARY-MARGARET NOLAND (GA Bar No. 688181)

mary-margaret.noland@mgclaw.com

MARK J. EDWARDS (GA Bar No. 698903)

Mark.edwards@mgclaw.com

Post Office Box 57365

270 Peachtree Street, NW, Suite 1800 (30303)

Atlanta, Georgia 30343

(678) 500-7314

*Attorneys for Heather Page*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Notice of Notice of Removal to Federal Court* was served upon all counsel of record via the Court's electronic filing system, which automatically sends a service copy via electronic mail notification to all counsel of record addressed as follows:

Email: smoskowitz@attorneykennugent.com  
Sarah E. Moskowitz  
Kenneth S. Nugent, P.C.  
4227 Pleasant Hill Road, Building 11  
Duluth, Georgia 30096  
Attorney for Jeffrey Russell

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE, LLC

/s/ Mary-Margaret Noland  
MARY-MARGARET NOLAND (GA Bar No.  
688181)  
mary-margaret.noland@mgclaw.com  
MARK J. EDWARDS (GA Bar No. 698903)  
Mark.edwards@mgclaw.com  
Post Office Box 57365  
270 Peachtree Street, NW, Suite 1800 (30303)  
Atlanta, Georgia 30343  
(678) 500-7314  
*Attorneys for Heather Page*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

JEFFREY RUSSELL,

Plaintiff,

v.

HEATHER PAGE,

Defendant.

CIVIL ACTION NO. \_\_\_\_\_

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Heather Page (hereinafter “Defendant”), by and through her undersigned counsel, hereby removes this action from the State Court of Cobb County, Georgia, to the United States District Court for the Northern District of Georgia, Atlanta Division.

Removal is based on diversity jurisdiction because there is complete diversity of citizenship between Plaintiffs and Defendants served in this matter, and the amount in controversy is in excess of \$75,000.00. In support of its Notice of Removal (“Notice”), Defendant states the following:

**I. Background**

1. This case was originally filed by Plaintiff Jeffrey Russell in the State Court of Cobb County, Georgia on April 30, 2023. In Plaintiff’s Complaint for

Damages (the “Complaint”), Plaintiff Jeffrey Russell alleges he sustained injuries to his self and damage to his vehicle after being involved in a motor vehicle accident on or about November 19, 2021.

2. In accordance with 28 U.S.C. 1446(a), a copy of all process, pleadings, and orders served upon Defendant are attached hereto as **Exhibit A.** A copy of the Notice of Filing Notice of Removal, filed in the State Court of Cobb County, Georgia is attached hereto as **Exhibit B.**

## **II. THIS NOTICE OF REMOVAL IS TIMELY FILED**

3. This lawsuit is a case within the meaning of the Acts of Congress relating to the removal of civil actions.

4. Defendant received a copy of Plaintiff’s Complaint by individual service on May 15, 2023. The Affidavit of Service of Process is attached hereto as **Exhibit C.**

5. The removal of this action to this Court is timely under 28 U.S.C. § 1446(b) because this Notice of Removal is filed within thirty (30) days after May 15, 2023, which is the date Defendant first received the Summons and Complaint in this action. **(Exhibit C).**

6. The United States District Court for the Northern District of Georgia, Atlanta Division, is the proper place to file this Notice of Removal under 28 U.S.C. § 1441(a) because it is the federal district court that embraces the place

where the original action was filed and is pending.

### **III. THIS COURT HAS DIVERSITY JURISDICTION**

7. Upon information and belief and according to the pleadings in this matter, Plaintiff Jeffery Russell is a resident, domiciliary and citizen of Cobb County in the State of Georgia, who resides at 2164 Asquith Avenue SW Marietta, Georgia 30008. Mr. Russell has filed his case in Cobb County State Court and has therefore submitted to the jurisdiction. Plaintiff alleges he sustained property damage to his vehicle and bodily injury from a motor vehicle accident involved with Defendant on or around November 19, 2021. This Court has personal jurisdiction over Plaintiff Jeffery Russell.

8. Defendant Heather Page is a resident, domiciliary and citizen of Collierville, Tennessee who resides at 240 Brier Hills Drive, Collierville, Tennessee 38017. **Exhibit C.**

9. Upon information and belief, there is complete diversity of citizenship between “the parties in interest properly joined and served as defendants.”

10. According to the Complaint, Plaintiff has special damages in the amount of \$50,200.07. He also claims significant physical and mental pain and suffering and costs and expenses of the litigation. In addition, Plaintiff has presented a surgical estimate from Barbour Orthopedics and Sports Medicine totaling an additional \$73,468.90, which brings the Plaintiff’s claims well above

the \$75,000.00 requirement for removal. Due to the medical nature of the billings, Defendant has not attached the document as an exhibit, but can provide a sealed copy upon request by the Court and permission by Plaintiff.

#### **IV. NOTICE OF REMOVAL TO THE STATE COURT OF COBB COUNTY**

11. Concurrently with this Notice of Removal, Defendant Heather Page will file a copy of this Notice with the State Court of Cobb County, Georgia. A copy of the written notice of the Notice of Removal to Federal Court is attached hereto as **Exhibit B**. In accordance with 28 U.S.C. § 1446(d), Defendant Heather Page will give written notice to Plaintiff by contemporaneously serving him with this Notice.

12. If any questions arises as to the propriety of the removal of this action, Defendant respectfully requests the opportunity to present a brief and oral argument in support of its position that this case is removable. See *Sierminski v. Transouth Fin. Corp.*, 216 F.3d 945, 949 (11th Cir. 2000) (post-removal evidence in assessing removal jurisdiction may be considered by the Court).

#### **IV. CONCLUSION**

For the foregoing reasons, Defendant Heather Page, respectfully requests that this civil action be, and is hereby, removed to the United States District Court for the Northern District of Georgia, Atlanta Division, that this Court assume jurisdiction of this civil action, and that this Court enter such other that further



orders as may be necessary to accomplish the requested removal.

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE,  
LLC

/s/ Mary-Margaret Noland

MARY-MARGARET NOLAND (GA Bar  
No. 688181)

mary-margaret.noland@mgclaw.com

MARK J. EDWARDS (GA Bar No.  
698903)

Mark.edwards@mgclaw.com

Post Office Box 57365

270 Peachtree Street, NW, Suite 1800  
(30303)

Atlanta, Georgia 30343

(678) 500-7314

*Attorneys for Heather Page*

**CERTIFICATION**

Pursuant to L.R. 7.1(D) N.D.Ga., I certify that this document has been prepared in Times New Roman Font 14 point, as approved by the Court in L.R. 5.1B, N.D.Ga.

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE,  
LLC

/s/ Mary-Margaret Noland

MARY-MARGARET NOLAND (GA Bar  
No. 688181)

mary-margaret.noland@mgclaw.com

MARK J. EDWARDS (GA Bar No.  
698903)

Mark.edwards@mgclaw.com

Post Office Box 57365

270 Peachtree Street, NW, Suite 1800  
(30303)

Atlanta, Georgia 30343

(678) 500-7314

*Attorneys for Heather Page*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing *Notice of Removal* was served upon all counsel of record via the Court's electronic filing system which automatically sends a service copy via electronic mail notification to all counsel of record addressed as follows:

Email: smoskowitz@attorneykennugent.com  
Sarah E. Moskowitz  
Kenneth S. Nugent, P.C.  
4227 Pleasant Hill Road, Building 11  
Duluth, Georgia 30096  
Attorney for Jeffrey Russell

This the 14th day of June, 2023.

MCANGUS GOUDELOCK & COURIE,  
LLC

/s/ Mary-Margaret Noland  
MARY-MARGARET NOLAND (GA Bar  
No. 688181)  
mary-margaret.noland@mgclaw.com  
MARK J. EDWARDS (GA Bar No.  
698903)  
Mark.edwards@mgclaw.com  
Post Office Box 57365  
270 Peachtree Street, NW, Suite 1800  
(30303)  
Atlanta, Georgia 30343  
(678) 500-7314  
*Attorneys for Heather Page*

# **EXHIBIT C**

ID# E-DXHKZUH-ZVS5  
 EFILED IN OFFICE  
 CLERK OF STATE COURT  
 COBB COUNTY, GEORGIA  
**23-A-1819**

IN THE STATE COURT OF COBB COUNTY  
 STATE OF GEORGIA

JEFFREY RUSSELL

Case No.: 23-A-1819

MAY 17, 2023 04:44 PM

Plaintiff/Petitioner

VS.

HEATHER PAGE

Defendant/Respondent

*Robin C. Bishop*  
 Robin C. Bishop, Clerk of State Court  
 Cobb County, Georgia

AFFIDAVIT OF SERVICE OF  
**SUMMONS; COMPLAINT FOR DAMAGES; GENERAL  
 CIVIL AND DOMESTIC RELATIONS CASE FILING  
 INFORMATION FORM; PLAINTIFF'S FIRST REQUEST  
 FOR PRODUCTION OF DOCUMENTS TO DEFENDANT;  
 PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS TO  
 DEFENDANT; PLAINTIFF'S FIRST INTERROGATORIES  
 TO DEFENDANT**

Received by Keelan Sanders, on the 5th day of May, 2023 at 10:38 AM to be served upon Heather Page at 240 Brier Hills Drive, Collierville, Fayette County, TN 38017.

On the 15th day of May, 2023 at 7:38 PM, I, Keelan Sanders, SERVED Heather Page at 240 Brier Hills Drive, Collierville, Fayette County, TN 38017 in the manner indicated below:

**INDIVIDUAL SERVICE**, by personally delivering 1 copy(ies) of the above-listed documents to Heather Page.

THE DESCRIPTION OF THE PERSON WITH WHOM THE COPY OF THIS PROCESS WAS LEFT IS AS FOLLOWS:

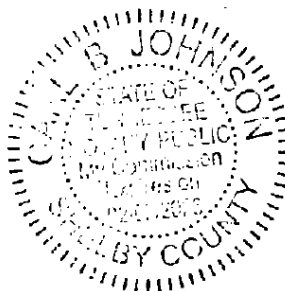
I delivered the documents to Heather Page with identity confirmed by subject saying yes when named. The individual accepted service with direct delivery. The individual appeared to be a blonde-haired white female contact 35-45 years of age, 5'4"-5'6" tall and weighing 140-160 lbs.

Per 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

NAME: Keelan Sanders 2984 5-17-23  
 Keelan Sanders Server ID # Date

Notary Public: Subscribed and sworn before me on this 17 day of MAY in the year of 2023  
 Personally known to me X or        identified by the following document:

*Carl B. Johnson*  
 Notary Public (Legal Signature)



REF: 1082924

Page 1 of 1

Tracking #: 0106580857

